

Exhibit A

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE
(CRT) ANTITRUST LITIGATION

Master File No.
3:07-cv-05944 SC
MDL NO. 1917
Judge: Hon. Samuel Conti

VIDEOTAPED DEPOSITION OF JAMES MCCLAVE, Ph.D.

Taken on Behalf of the Defendant

DATE TAKEN: Wednesday, June 25, 2014

TIME: 9:00 a.m. - 1:50 p.m.

PLACE: Greenberg Traurig
450 South Orange Avenue
Orlando, Florida

STENOGRAPHICALLY REPORTED BY:
NORA KELLY-MEOLA, RPR

Job No. 80760

1 APPEARANCES:

Counsel for Plaintiff and the witness:

2 Philip Iovieno
Anne Nardacci
3 Kyle Smith
Boies Schiller & Flexner
4 30 South Pearl Street
Albany, NY 12207
5

6 Counsel for Plaintiff, Philips:

7 Charles Loughlin
Baker Botts
8 1299 Pennsylvania Avenue Northwest
Washington, DC 20004
9

10 Counsel for Plaintiff, ViewSonic Corp and Target Corp.:

11 Robert McNary
Crowell & Moring
515 South Flower Street
12 Los Angeles, CA 90071
13

14 Counsel for Plaintiff and the witness:

Jonathan Weiss
15 Klee Tuchin Bogdanoff & Stern
1999 Avenue of the Stars
16 Los Angeles, CA 90067
17

18 Counsel for Plaintiff, Mitsubishi:

John Lahad
19 Susman Godfrey
1000 Louisiana
20 Houston, TX 77002
21

22 Counsel for Defendant, Panasonic:

Jeffrey Kessler
23 Jennifer Stewart
Winston & Strawn
24 200 Park Avenue
New York, NY 10166
25

1 Counsel for Defendant, Samsung SDI:
James McGinnis
2 Sheppard Mullin Richter & Hampton
Four Embarcadero Center
3 San Francisco, CA 94111
4

5 Counsel for Defendant, LG:
William Temko
6 Munger Tolles & Olson
355 South Grand Avenue
7 Los Angeles, CA 90071
8

9 Counsel for Defendant, Chunghwa Picture Tube:
Rachel Brass
10 Gibson Dunn & Crutcher
555 Mission Street
11 San Francisco, CA 94105
12

13 Counsel for Defendant, Mitsubishi:
Lucius Lau
White & Case
14 701 Thirteenth Street Northwest
Washington, DC 20005
15

16 Counsel for Defendant, Hitachi:
Matthew Hertko
17 Kirkland & Ellis
300 North LaSalle
18 Chicago, IL 60654
Appeared via telephone conference call
19
20

21 Counsel for State of California:
Paul Moore, III
22 Deputy Attorney General - State of California
455 Golden Gate Avenue
23 San Francisco, CA 94012
Appeared via telephone conference call
24
25

1 Counsel for Defendant, Mitsubishi Electric:
2 Shaun Van Horn
3 Jenner & Block
4 353 North Clark Street
5 Chicago, IL 60654
6 Appeared via telephone conference call
7

8 ALSO PRESENT:

9 Jamie Hollingsworth, Videographer
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1 Q. So in your experience when you're looking at
2 price, it is common to use a log-log model of cost and
3 demand factors?

4 A. Yes. In my experience it's common.

5 MR. MCGINNIS: I don't have any other questions
6 for you. Thank you.

7 MR. TEMKO: I have no questions.

8 MS. BRASS: I have just a couple.

9 CROSS-EXAMINATION

10 BY MS. BRASS:

11 Q. Hello, Dr. McClave. I'm Rachel Brass. I'm
12 from Gibson, Dunn & Crutcher, the Chunghwa Picture Tube
13 defendants.

14 A. Hello.

15 Q. Hello. Just to make sure I understand your
16 report, do you attempt to offer an opinion on the
17 traceability of tubes sold by Chunghwa Pictures Tubes to
18 particular tube customers or to the plaintiffs for whom
19 you have submitted your report?

20 A. Did I understand you to ask about
21 traceability --

22 Q. Exactly.

23 A. -- following the tube?

24 Q. Yeah. Do you offer an opinion on that?

25 A. No.

1 Q. Okay. Do you know or did you study what
2 proportion of purchases made by any of the plaintiffs in
3 your report included Chunghwa Picture Tubes as tubes?

4 A. So make sure I understand it, the finished
5 products that purchased by plaintiffs, is that what
6 you're asking about?

7 Q. Uh-hum. Did you study what percentage of tubes
8 in the products they purchased were Chunghwa Pictures
9 Tubes tubes?

10 A. No.

11 MS. BRASS: Okay. I think those are all my
12 questions. Thank you.

13 THE WITNESS: Sure.

14 MR. LOUGHLIN: No questions.

15 MS. BRASS: Does anyone on the phone have any
16 questions?

17 MR. KESSLER: Does anyone on the phone have any
18 questions?

19 MR. MOORE: This is Paul Moore for one of the
20 defendants, we just have a couple of questions.

21 MR. KESSLER: You can go. Please proceed.

22 CROSS-EXAMINATION

23 BY MR. MOORE:

24 Q. Thank you. Dr. McClave, did you do anything to
25 evaluate the effects of differing levels of vertical

DEPONENT'S ERRATA SHEET AND SIGNATURE INSTRUCTIONS

INSTRUCTIONS TO DEPONENT

After reading this volume of your deposition, indicate any corrections or changes to your testimony and the reasons therefor on the Errata Sheet supplied to you and sign it. DO NOT make marks or notations on the transcript volume itself.

*** REPLACE THIS PAGE OF THE TRANSCRIPT WITH THE COMPLETED AND SIGNED ERRATA SHEET WHEN RECEIVED.

1 ATTACH TO THE DEPOSITION OF JAMES MCCLAVE, Ph.D.
2 CASE: In re: CRT Antitrust litigation
3 CASE NO.: 3:07-cv-05944-SC

4 ERRATA SHEET

5 I, JAMES MCCLAVE, Ph.D., have read the foregoing
6 deposition given by me on Wednesday, June 25, 2014, in
7 Orlando, Florida, and the following corrections, if any,
8 should be made in the transcript:

9	PAGE	LINE	CORRECTION AND REASON THEREFOR
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17 Subject to the above corrections, if any, my
18 testimony reads as given by me in the foregoing
19 deposition.

20 SIGNED at _____ Florida, this
21 _____ day of _____, 20____.

22 _____
23 JAMES MCCLAVE, Ph.D.
24
25

CERTIFICATE OF REPORTER OATH

STATE OF FLORIDA

COUNTY OF POLK

I, the undersigned authority, hereby certify
that the witness named herein personally appeared before
me and was duly sworn.

WITNESS my hand and official seal this 8th day
of July 2014.

NORA KELLY-MEOLA, RPR, CLR

NOTARY PUBLIC - STATE OF FLORIDA

MY COMMISSION NO. FF 065827

EXPIRES: NOVEMBER 27, 2017

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1 REPORTER'S DEPOSITION CERTIFICATE

2
3 STATE OF FLORIDA4 COUNTY OF POLK
5

6 I, Nora Kelly-Meola, Shorthand Reporter and
7 Notary Public in and for the State of Florida at large,
8 hereby certify that the witness appeared before me for
9 the taking of the foregoing deposition, and that I was
10 authorized to and did stenographically and
11 electronically report the deposition, and that the
12 transcript is a true and complete record of my
13 stenographic notes and recordings thereof.

14 I FURTHER CERTIFY that I am neither an attorney,
15 nor counsel for the parties to this cause, nor a
16 relative or employee of any attorney or party connected
17 with this litigation, nor am I financially interested in
18 the outcome of this action.

19 DATED THIS 8th day of July 2014 at Lakeland,
20 Polk County, Florida.
21
22

23 _____
24 Nora Kelly-Meola
25 SCLAFANI WILLIAMS COURT REPORTERS, INC.